

GAWTHROP GREENWOOD, PC  
Attorneys for National Maritime Services  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
Camden Division

GLANDER INTERNATIONAL BUNKERING,

Plaintiff,

IN ADMIRALTY

-against-

NO. 1:15-CV-4200-RMB-AMD

M/V VENTA, IMO No. 9072749, her engines,  
freights, apparel, appurtenances, tackle, etc., *in*  
*rem*,

Defendant.

\_\_\_\_\_  
VITALIJ NIOLAICIK, et al.

Intervening Plaintiffs,

-against-

AB Lieutvos Juru Laivininkyste (Lithuanian  
Shipping Co.)

Defendant,

The Master of the M/V VENTA,

Garnishee.

\_\_\_\_\_

CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED  
2015 AUG 12 P 2:37

**MOTION FOR PAYMENT OF CUSTODIAL EXPENSES**

Appointed Substitute Custodian, National Maritime Services, through their attorneys, respectfully moves this Court for an Order that all outstanding custodial expense be paid prior to the release of the vessel from arrest and/or attachment and/or garnishment and as grounds therefore states as follows:

1. By Order dated June 25, 2015, this Court appointed National Maritime Services as Substitute Custodian for the motor vessel VENTA in place and stead of the United States Marshal. Dkt. # 8.

2. The vessel was subsequently arrested by the United States Marshal pursuant to a Warrant of Arrest issued by this Court and the United States Marshal transferred custody and control of the vessel to National Maritime Services. Dkt. # 9.

3. Since that time National Maritime Services has incurred expenses *in custodial legis* in the care, custody and safe keeping of the vessel and crew to the benefit of all Claimants and those claiming an interest in the vessel. *See attached*, National Maritime Services' Summary of Charges through August 11, 2015.

WHEREFORE, National Maritime Services, as the Court appointed Substitute Custodian, respectfully requests the Court enter an Order, proposed form attached, that all outstanding custodial expenses be paid prior to the release of the vessel from arrest and/or attachment and/or garnishment, in line with the requirement that all United States Marshal's fees and expenses be paid prior to release. *See*, Order Authorizing Issuance of Warrant of Arrest, dated June 25, 2015, Dkt. # 7.

Dated: August 12, 2015

Respectfully submitted,

GAWTHROP GREENWOOD, PC

A handwritten signature in black ink, appearing to read 'S. L. Knapp', is written over a horizontal line.

SANDRA L. KNAPP (NJ Attorney ID  
023601986)

STEPHEN R. McDONNELL (Attorney ID  
035991994)

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*Attorneys for National Maritime Services*


**NATIONAL MARITIME SERVICES**

1915 SOUTHWEST 21<sup>ST</sup> AVENUE  
FORT LAUDERDALE, FLORIDA 33312  
TELEPHONE: (954) 980-1290

**SUMMARY OF CHARGES THROUGH AUGUST 11, 2015**

CASE NUMBER: 1:15-cv-04200-RMB-AMD

VESSEL NAME: Venta

TYPE OF VESSEL: 1995 Bulk Carrier

STOCK NUMBER: 34435

Date	Description	EST	Units	Unit cost	Amount	Handling Fees	Total
6/30/2015	Arrest coordination fee		1	1,950.00	1,950.00		1,950.00
6/30/2015	Watchman airfare Jacksonville, FL to Philadelphia, PA		1	266.00	266.00	39.90	305.90
6/30/2015	Watchman ground transportation		1	46.00	46.00	6.90	52.90
6/30/2015	Custodians Liability Insurance		1	590.00	590.00		590.00
7/2/2015	Docking pilot at Balzano terminal		1	582.00	582.00	87.30	669.30
7/2/2015	Tugs for shift to Marcus Hook anchorage		1	2,000.00	2,000.00	300.00	2,300.00
7/2/2015	Pilot for shift from terminal to Marcus Hook anchorage	✓	1	750.00	750.00	112.50	862.50
7/13/2015	200 MT water including fuel surcharge		1	6,400.00	6,400.00	960.00	7,360.00
6/30/15-8/11/15	Watchman per day		43	425.00	18,275.00		18,275.00
6/30/15-8/11/15	Daily custody fee		43	238.48	10,254.64		10,254.64
7/20/2015	Electrical motor for vessel air conditioner repair		1	3,298.40	3,298.40	494.76	3,793.16
7/20/2015	Delivery of electrical motor to vessel		1	565.00	565.00	84.75	649.75
7/14/15-7/16/15	Port agent first three days		1	1,500.00	1,500.00	225.00	1,725.00
7/17/15/15-8/11/15	Port agent per day		26	200.00	5,200.00	780.00	5,980.00
7/22/2015	Launch for pilot, shore to ship. Shifting anchorage as per USCG		1	450.00	450.00	67.50	517.50
7/22/2015	Pilot for shift from Marcus Hook to Kaighn's Point anchorage		1	750.00	750.00	112.50	862.50
7/27/2015	Tugs for shift from Kaighn's Point anchorage to Terminal		1	2,000.00	2,000.00	300.00	2,300.00
7/27/2015	Docking pilot at Balzano terminal		1	582.00	582.00	87.30	669.30
7/27/15-7/29/15	Dockage, 3786 per/day		3	3,786.00	11,358.00	1,703.70	13,061.70
7/27/15-7/29/15	Line handlers		1	532.36	532.36	79.85	612.21
7/27/15-7/29/15	Supervisor		1	65.12	65.12	9.77	74.89
7/29/2015	Ring Maritime Services, security guards required by CBP at terminal (2)		1	1,170.00	1,170.00	175.50	1,345.50
7/29/2015	Docking pilot from Balzano terminal		1	582.00	582.00	87.30	669.30
7/29/2015	Tugs for shift from terminal to Kaighn's Point anchorage		1	2,000.00	2,000.00	300.00	2,300.00
7/28/2015	Garbage removal		1	962.50	962.50	144.38	1,106.88
7/28/2015	Sewage water transfer		1	2,025.00	2,025.00	303.75	2,328.75
7/28/2015	Ring maritime services, escort/transport of sick crew member		1	1,526.25	1,526.25	228.94	1,755.19
7/28/2015	Medical assistance for crew member Aleksandr Gavrilenko hospital fees.	✓	1	5,000.00	5,000.00	750.00	5,750.00
7/29/2015	Crew medication		1	244.72	244.72	36.71	281.43
7/29/2015	Crew provisions		1	2,216.99	2,216.99	332.55	2,549.54
7/29/2015	Crew provisions		1	399.54	399.54	59.93	459.47
7/30/2015	Custodians Liability Insurance		1	590.00	590.00		590.00
<b>TOTAL CHARGES</b>							<b>92,002.30</b>
6/22/2015	Payment Receipt - Glander International Bunkering						5,000.00
7/10/2015	Payment Receipt - Glander International Bunkering						11,905.36
<b>BALANCE DUE</b>							<b>75,096.94</b>

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Camden Division

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Plaintiff,

IN ADMIRALTY

-against-

NO. 1:15-CV-4200-RMB-AMD

M/V VENTA, IMO No. 9072749, her engines,  
freights, apparel, appurtenances, tackle, etc., *in*  
*rem*,

Defendant.

\_\_\_\_\_/

VITALIJ NIOLAICIK, et al.

Intervening Plaintiffs,

-against-

AB Lieutvos Juru Laivininkyste (Lithuanian  
Shipping Co.)

Defendant,

The Master of the M/V VENTA,

Garnishee.

\_\_\_\_\_/

**CERTIFICATE OF SERVICE**

I, Stephen R. McDonnell, Esq. hereby certify that on August 12, 2015, I caused the foregoing Motion for Payment of Custodial Expenses to be filed with the Court and mailed to all counsel of record via First Class Mail.

  
STEPHEN R. McDONNELL

/990558/1

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Defendant,

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\_\_\_\_\_/

**ORDER GRANTING MOTION FOR PAYMENT OF CUSTODIAL EXPENSES**

Upon the Motion of Court-appointed Substitute Custodian National Maritime Services' for Payment of Custodial Expenses, and the Court, having reviewed the Motion and being otherwise duly advised in the premises, it is hereby

ORDERED that said Motion is hereby GRANTED. The vessel shall not be released from arrest, attachment or garnishment without payment of outstanding custodial expenses.

SO ORDERED and SIGNED, this \_\_\_\_\_ day of August, 2015.

\_\_\_\_\_  
U.S. DISTRICT COURT JUDGE

Copies furnished to:

All counsel of record